

TODD E. KENNEDY, ESQ.
 Nevada Bar No. 6014
KENNEDY & COUVILLIER
 3271 E. Warm Springs Rd.
 Las Vegas, Nevada 89120
 702-605-3440
Tkennedy@kclawnv.com

Attorneys for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

Mark Streeter, derivatively on behalf)
 Of the shareholders of Glow Threads, Inc.,)
)
 Plaintiff,)
 v.)
)
 Arman Izadi a/k/a Alexander Izadi a/k/a)
 Armani; Sancho Van Ryan a/k/a Sancho)
 Jinadasa; Brian Epling, as the trustee of)
 The Orange Trust; The Orange Trust;)
 Bonnie Izadi a/k/a Bonnie Roberts; Viva)
 La Merch d/b/a My Merch or)
 MYMERH.COM and Glow Threads, Inc.;)
 Adli Law Group, P.C.; Glow Threads, Inc.,)
 As a nominal Defendant for derivative)
 Claims and as a direct defendant for the)
 Individual Claims,)
)
 Defendants.)
)

Case No: 2:18-cv-01916-RFB-VCF

STIPULATION AND ORDER
CONSENTING TO THE FILING OF
SECOND AMENDED COMPLAINT
AND EXTENDING TIME TO
RESPOND TO MOTION TO DISMISS

[FIRST REQUEST]

Plaintiff Mark Streeter and Defendants Arman Izadi, Sancho Van Ryan, Brian Epling (as trustee for the Orange Trust), Bonnie Izadi, Glow Threads, Inc. and Adli Law Group, P.C., by and through their counsel, stipulate as follows:

1. Defendants filed a Motion to Dismiss (ECF No. 25) the First Amended Complaint on February 27, 2020. A response to that motion is due on March 12, 2020.

2. Plaintiff has indicated a desire to file a Second Amended Complaint rather than

litigate the issues raised in the Motion to Dismiss under the First Amended Complaint.

3. Defendants consent to the filing by Plaintiff of a Second Amended Complaint. In order to provide time for Plaintiff's counsel, who is new to this case, to collect information and prepare an amended pleading, the Parties agree that Plaintiff shall have until March 23, 2020 to file a Second Amended Complaint. If Plaintiff files a Second Amended Complaint, Defendants Motion To Dismiss (ECF No. 25) shall be withdrawn and moot.

4. The Parties further stipulate that, to provide time for Plaintiff's counsel to prepare a Second Amended Complaint, the time for Plaintiff to respond to the Motion to Dismiss shall be extended to March 23, 2020 as well to avoid unnecessary motions practice on the existing motion to dismiss.

5. Defendants by consenting to the above reserve all rights, arguments and defenses and their stipulation consenting the filing of a Second Amended Complaint in no way agrees or concedes that sufficiency of that amended pleading and they reserve the right to file any appropriate motion in response.

6. If Plaintiff files the Second Amended Complaint, Defendants shall have until April 13, 2020, in which to answer or otherwise respond.

7. This is the first request to extend time to respond to the Motion to Dismiss (ECF

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No. 25] and is made in good faith and not for the purpose of delay.

Dated this 12th day of March 2020.

KENNEDY & COUVILLIER

CLARK HILL PLLC

By: /s/ Todd E. Kennedy, Esq.
TODD E. KENNEDY, ESQ.
Nevada Bar No. 6014
3271 E. Warm Springs Rd.
Las Vegas, Nevada 89120
Tel: (702) 608-7931
Email: tkennedy@kclawnv.com

By: /s/ Mark Dzarnoski, Esq.
MARK DZARNOSKI, ESQ.
Nevada Bar No. 6696
3800 Howard Hughes Parkway,
Suite 500
Las Vegas, Nevada 89169
Telephone: (702) 862-8300
Email: mdzarnoski@clarkhill.com

Counsel for Plaintiff Mark Streeter

*Counsel for Defendants Arman Izadi,
Sancho Van Ryan,
Bonnie Izadi, and Glow Threads, Inc*

JENNINGS & FULTON, LTD.

CLARK HILL PLLC

By: Adam R. Fulton, Esq.
JARED B. JENNINGS, ESQ.
Bar No. 7762
ADAM R. FULTON, ESQ.
Bar No. 11572
LOGAN WILSON, ESQ.
Bar No. 14967
2580 Sorrel Street
Las Vegas Nevada 89146
Tel: (702) 979-3565
Email: jjennings@jfnvlaw.com
Email: afulton@jfnvlaw.com
Email: logan@jfnvlaw.com

By: /s/ Nicholas M. Wieczorek, Esq.
NICHOLAS M. WIECZOREK, ESQ.
Nevada Bar No. 6170
3800 Howard Hughes Parkway,
Suite 500
Las Vegas, Nevada 89169
Telephone: (702) 862
Email: nwieczorek@clarkhill.com

Counsel for Defendant Adli Law Group

*Attorneys for Brian Epling as trustee for The
Orange Trust*

ORDER

IT IS SO ORDERED.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 13th day of March, 2020.